IN THE DRAWINGS:

The attached replacement sheets of drawings now show Figures 2 and 3 on separate sheets. In Figure 3, the additional wellbore "11" has been added.

Attachment: **Replacement Sheets**

REMARKS

This is intended as a full and complete response to the Office Action dated April 21, 2006, having a shortened statutory period for response extended one-month set to expire on August 21, 2006.

Claims 1-3, 5-10, 12-17, 26, 27, 30-36, 38-46, and 48-55 remain pending in the application after entry of this response. Claims 39 and 47 have been cancelled, and claims 50-55 have been added. Claims 15, 16, 27, and 47 are allowable. Reconsideration of the rejected claims is requested for reasons presented herein.

Drawings

The drawings are objected to under 37 C.F.R. § 1.83(a) for failing to show the "first" and "second" wellbores (claim 48).

Applicant has attached herewith replacement drawing sheets in which Figures 2 and 3 are placed on separate sheets and Figure 3 has been amended to show the additional wellbore identified as "11".

35 U.S.C. § 112

Claims 48 and 49 are rejected under 35 U.S.C. § 112, first paragraph.

Applicant submits that a second wellbore was described in the specification, for example, in paragraph [0026]. The additional wellbore is now shown in amended Figure 3 as reference number "11", and paragraph [0026] has been amended to reflect that the wellbore is now shown as "11". Applicant submits no new matter has been introduced. Withdrawal of the rejection is respectfully requested.

35 U.S.C. § 102

Claims 1-3, 5, 6, 10, 12, 13, 31-33, 35, 37, and 39-46 are rejected under 35 U.S.C. § 102(b) as being anticipated by *Kisman,* U.S. Patent No. 6,039,121.

Kisman discloses an apparatus for production of hydrocarbons. The wellbore is divided into three co-extensive passageways. Production fluid rises up the first conduit 18 where the some of the fluid is transformed into steam. (See col. 6, lns. 1-5.) After

exiting port 17 in the first conduit 18, the gas flow up the annulus and the liquid falls down the annulus and collect in a liquid pool. A pump located in the liquid pool pumps the liquid up a second conduit 19. (See col. 6, lns. 15-19.) The liquid in the liquid pool has a higher density than the formation fluid inside the first conduit at corresponding elevations. (See col. 6, lns. 59-67.) Thus, the pressure at the bottom inlet 20 of the second conduit 19 is higher than at the corresponding elevation insider the first conduit 12. (See col. 6, lns. 59-67.) *Kisman* does not teach, show, or suggest a pump positioned above said cooling zone in that portion of said well fluids having a lower density than a density of said well fluids in the cooling zone, as recited in claim 1.

Also, *Kisman* does not teach, show, or suggest positioning a pump above the cooling zone in said tubular in that portion of the well fluids containing a mixture of gas phase and liquid phase fluids, as recited in claim 10.

Further, *Kisman* discloses that the pump is positioned in the liquid pool and that the liquid pool is insulated from the first conduit. (See col. 5, lns. 48-52.) *Kisman* does not teach, show, or suggest a pump positioned above the cooling zone, wherein the pump is operated to maintain a pressure within the cooling zone sufficient to vaporize the additive material, as recited in claim 31. *Kisman* does not teach, show, or suggest positioning a pump in the cooled formation fluids and operating the pump to maintain a pressure in the cooling zone sufficient to vaporize the water, as recited in new claim 50.

Claim 40 has been amended to include the limitations of claim 47 and is believed to be in condition for allowance. Withdrawal of the rejection is respectfully requested.

35 U.S.C. § 103

Claims 7-9, 14, 17, 26, 30, 34, 36, and 38 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kisman* in view of *Stuebinger, et al.* (U.S. 6,079,491).

As discussed above, Applicant believes every independent claim is in condition for allowance. Therefore, Applicant also believes these dependent are also in condition for allowance. Withdrawal of the rejection is respectfully requested.

Claims 48 and 49 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Butler* (U.S. 5,607,016) in view of *Kisman*.

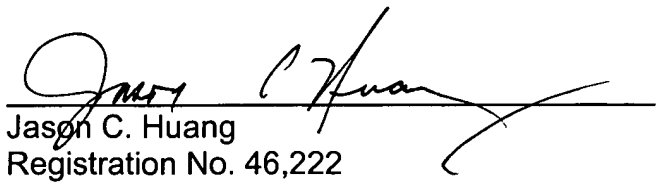
Butler does not disclose operating a pump to maintain pressure sufficient to vaporize water. As discussed above, *Kisman* discloses that the pump is positioned in the liquid pool and that the liquid pool is insulated from the first conduit. (See col. 5, lns. 48-52.) Thus, operation of the *Kisman* pump cannot affect the cooling zone as the fluid travels up the first conduit. The references, neither alone nor in combination, teach, show, or suggest providing a cooling zone in the second wellbore, wherein a pressure in the cooling zone is sufficient to vaporize the water and positioning a pump in the cooling zone, as recited in claim 48.

Conclusion

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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